UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,	Civil Action No. 1:19-cv-12551-FDS
Plaintiff,	
v.	Hon. F. Dennis Saylor IV
GOOGLE LLC,	
Defendant.	

PLAINTIFF'S MOTION TO COMPEL INSPECTION, TESTING AND SOURCE CODE
OF THE ACCUSED PRODUCTS

Plaintiff Singular Computing LLC ("Singular") hereby moves pursuant to Fed. R. Civ. P. 37(a)(4) to compel Google LLC to provide for inspection, testing, and production of source code. Singular submits the accompanying Memorandum of Law in Support of Plaintiff's Motion to Compel Inspection, Testing, and Source Code of the Accused.

As set forth in Singular's Memorandum of Law, the discovery that Singular seeks from Google is relevant to material facts at issue in this litigation and Google has no justifiable reason for not providing the documents and information Singular seeks. For these reasons, as set forth more fully in the accompanying Memorandum of Law, Singular respectfully requests that this Honorable Court provide relief consistent with that requested in the attached Memorandum of Law.

Dated: July 23, 2021   Respectfully submitted,

                                          /s/ Paul J. Hayes
                                          Paul J. Hayes (BBO #227000)
                                          Matthew D. Vella (BBO #660171)
                                          Kevin Gannon (BBO #640931)
                                          Daniel McGonagle (BBO #690084)
                                          Michael J. Ercolini (pro hac vice)
                                          Thomas R. Fulford (BBO #686160)
                                          Alyssa H. Ruderman (pro hac vice)
                                          PRINCE LOBEL TYE LLP
                                          One International Place, Suite 3700
                                          Boston, MA 02110
                                          Tel: (617) 456-8000
                                          Email: phayes@princelobel.com
                                          Email: mvella@princelobel.com
                                          Email: kgannon@princelobel.com
                                          Email: dmcgonagle@princelobel.com
                                          Email: mercolini@princelobel.com
                                          Email: tfulford@princelobel.com
                                          Email: aruderman@princelobel.com

                                          ATTORNEYS FOR THE PLAINTIFF

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Paul Hayes, counsel for Plaintiff, hereby certifies that Plaintiff's counsel met and conferred with counsel for Defendant, Google LLC, in a good-faith attempt to resolve or narrow the issues raised by this motion. The parties' conference relevant to this motion are detailed in the supporting memorandum.

                                          /s/ Paul Hayes

LOCAL RULE 37.1(b) CERTIFICATION

I, Paul Hayes, counsel for Plaintiff, hereby certify that Plaintiff's counsel complied with the provisions of Rule 37.1.

                                          /s/ Paul Hayes

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

                                          /s/ Paul Hayes

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